

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 22-80175-Cr-ROSENBERG/REINHART(s)(s)(s)

UNITED STATES OF AMERICA

vs.

WILLIE BOONE,

Defendant.

_____/

JOINT STATEMENT OF THE CASE

The government alleges that the defendant, Willie Boone, conspired with other persons to possess with intent to distribute N-Pyrrolidino Etonitazene, Methylenedioxymethamphetamine, Eutylone, and Cocaine, which are all controlled substances. The government further alleges that on March 3, 2022, Willie Boone possessed with intent to distribute N-Pyrrolidino Etonitazene, Eutylone, and Cocaine. The government further alleges that on March 3, 2022, Willie Boone knowingly possessed a firearm in furtherance of a drug trafficking crime. The government alleges that the firearm was a machinegun, which is commonly referred to as a “Glock Switch.” The government also alleges that on March 3, 2022, Willie Boone knowingly possessed a firearm in and affecting interstate and foreign commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year. The government alleges the firearm is one Glock, model 17 9mm semi-automatic pistol; and one Springfield Armory, Inc., model XD-S 9mm semi-automatic pistol. Finally, the government alleges that Willie Boone knowingly possessed a machinegun, commonly referred to as a “Glock Switch,” not registered to him in the National Firearms Registration and Transfer Record.

You will be instructed what the elements are for each charge, and the definitions to be applied to each as well at a later time in the trial.

/s/ Howard Schumacher

/s/ AUSA Shannon O'Shea Darsch

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Statement of the Case was electronically filed on behalf of both parties, with the Clerk of Court using CM/ECF on October 13, 2023.

/s/ Howard Schumacher

/s/ AUSA Shannon O'Shea Darsch